

causes of action pursuant to the Victims of Trafficking and Violence Protection Act of 2000 (“TVPA”) and RICO, under 18 U.S.C. § 1962(c) and (d), both of which are complex statutes with detailed pleading requirements and elements. Plaintiffs’ TVPA and RICO allegations are deficient for multiple, independent reasons. This request for three (3) additional pages is not for the purpose of delay or to complicate the proceedings but in order to ensure that the issues in dispute are clearly presented to the Court. A draft of the proposed Reply is attached as an Exhibit.

Crow has met and conferred with counsel for Plaintiffs and they are unopposed to the relief requested.

DATED: June 23, 2023

Respectfully submitted,

/s/ Kenneth C. Stone

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was served on all counsel of record via ECF on June 23, 2023:

/s/ Kenneth C. Stone

Kenneth C. Stone

Attorneys for Defendant Trammell S. Crow, Jr.

CERTIFICATE OF CONFERENCE

The undersigned conferred with Matthew W. Schmidt, counsel for Plaintiffs, via email on June 22, 2023, and Mr. Schmidt stated Plaintiffs are unopposed to the relief requested.

/s/ Kenneth C. Stone

Kenneth C. Stone